

ALLTEL Communications, Inc.
E-911
Twelfth Quarterly Report
August 1, 2005
CC Docket No. 94-102

Introduction

Alltel Communications, Inc. ("Alltel") is a cellular and PCS provider subject to the Phase II deployment requirements for Tier II carriers as contained in the Commission's Order to Stay, CC Docket No. 94-102, 17 FCC Rcd 14841 (2002) ("Stay Order"). Alltel has chosen an AGPS handset-based location technology to comply with the Phase II E-911 requirements. Alltel has exceeded each of the handset deployment thresholds set under the terms of the Stay Order, as has been reported to the Commission in previous quarterly reports. The chart below summarizes Alltel's efforts, which exceed the Commission's expectations and requirements for ALI capable handset deployments as set forth in the Stay Order.

FCC Threshold	Alltel Performance	Comments
March 1, 2003 Begin selling AGPS Handsets	AGPS handset sales begin on June 30, 2002.	Alltel initiated AGPS handset sales 8 months prior to the required date.
May 31, 2003 (25% of new handsets)	AGPS activations were 30.3% of total activations as of May 31, 2003	Alltel exceeded Stay Order requirements.
November 30, 2003 (50% of new handsets)	AGPS activations were 98% of new activations as of November 30, 2003	Alltel essentially met the May 31, 2004 threshold six months early.
May 31, 2004 (100% of new digital handsets)	Alltel met the threshold as reported in its quarterly report	Alltel had been activating ALI capable handsets almost exclusively since November 30, 2003 (see above)

Alltel is also required to begin delivering Phase II enhanced service to PSAPs by the later of six months of a bona fide PSAP request or March 1, 2003. Alltel is implementing Phase I and Phase II service to PSAPs in accord with the activation timetables negotiated with the PSAPs and has an exemplary record both for the timeliness and quality of its Phase I and Phase II activations.

This report is submitted pursuant to ¶¶ 28-31 of the Stay Order, and in accordance with the procedures established by Public Notice, Wireless Telecommunications Bureau Standardizes Reporting on Wireless E-911 Implementation, DA 03-1902 (released June 6, 2003). The spreadsheet required under the Public Notice is attached hereto.

Alltel has continued to actively engage the PSAPs within its market areas to ensure timely deployment of both Phase I and Phase II E-911 service in keeping with the status and readiness of the particular PSAP, the availability of vendor equipment and LEC upgrades, as well as the Commission's deadlines for Phase II E-911 under the Stay Order.

Finally, on July 11, 2005, the Commission approved the transfer of control of Western Wireless Corporation to Alltel Corporation. The parties consummated the transaction effective 12:01 AM on August 1, 2005.¹ As such, the information contained herein relates to "pre-merger" Alltel. The newly merged subsidiaries that were formerly held by Western Wireless Corporation are filing a separate report. Future reports will be filed on a consolidated basis under Alltel's auspices.

Discussion

I. Phase II AGPS Network Deployments

As previously reported, Alltel has completed switch upgrades, deployment and testing of redundant MPC/PDEs, and has implemented redundant trunking between these units. Alltel has configured its system consistent with the standard E-2 interface and has completed testing. As previously advised, further real-world testing of the MPC/PDE is necessary on a PSAP-by-PSAP basis to ensure end-to-end functionality. Alltel engages in such testing with capable PSAPs prior to cutting to live service. Alltel recently acquired GSM/TDMA-based systems from Public Service Cellular and Cingular (as a consequence of the divestiture requirements associated with the Cingular/AT&T Wireless merger). Alltel has deployed, or will deploy CDMA overlays in these markets and has established timetables with Commission staff to facilitate Phase II compliance via Alltel's existing Phase II AGPS handset-based technology solution. Due to unforeseen technical and operational obstacles, as well as the need to conduct additional testing designed to ensure reliable service to the public over the new CDMA overlay, Alltel was unable to activate and begin selling service over the CDMA overlay in the PSC markets until July 25, 2005. Alltel will provide Commission staff with information concerning the status of this market in the near future.

II. Handset Deployment

Alltel began deploying and activating its first ALI capable handsets in its markets on June 30, 2002 well in advance of the required March 1, 2003 date. It exceeded the May 31, 2003 handset deployment threshold (25% of new activations) with AGPS equipped handsets comprising approximately 30.3% of new handset activations as of that date. It also exceeded the November 30, 2003 threshold (50% of new activations) with AGPS equipped handsets comprising approximately 98% of new handset activations as of that

¹ See *Applications of Western Wireless Corporation and Alltel Corporation*, Memorandum Opinion and Order, WT Docket No. 05-50, FCC 05-138 (rel. July 19, 2005).

date. Alltel has substantially complied with the May 31, 2004 threshold requirement that 100% of all new digital handset activations must be ALI-capable.² In anticipation of the December 2005 requirement, Alltel continues its internal review of handset activations on a granular ESN by ESN basis with the assistance of its vendors to ensure that all location capable handsets are tracked accurately throughout Alltel's distribution system.

However, based on the current pace of customer migration to ALI-capable handsets and forecasted churn, it is unlikely that ALLTEL will meet the FCC's 95% requirement by December 31, 2005. The Company expects to file a waiver request for the merged company with the FCC no later than September 30, 2005 that will include an explanation of its compliance efforts and the expected "path to full compliance." ALI capable handset deployment levels for Alltel's current subscriber base stand at 74.8% as of June 30, 2005. Based upon current trends and projections, Alltel anticipates that ALI capable handsets will be deployed to approximately 85.0% of its pre-merger subscriber base as of December 31, 2005, and could take until the end of 2007 to reach the 95% penetration level. Alltel is continuously monitoring its number of activated ALI-capable handsets and will continue its ongoing efforts directed toward augmenting ALI capable handset penetration, including consideration of the attributes of those subscribers with non-ALI capable handsets. Those efforts will be detailed in any forthcoming waiver that Alltel will seek of the 95% penetration requirement.

The following is a summary list of AGPS-enabled handsets distributed by ALLTEL and their launch dates:

Vendor	Launch Date	Vendor	Launch Date
Audiovox 9155	June 2002	LG VX3100	February 2004
Kyocera 2325	October 2002	Kyocera KX434	March 2004
Motorola 120e	October 2002	Kyocera SE44	June 2004
Kyocera 7135	November 2002	Nokia 3587I	July 2004
Toshiba CDM9500	November 2002	LG 5550	August 2004
Kyocera 3225	March 2003	Audiovox 8910	November 2004
Motorola T720	February 2003	Motorola V710	November 2004
Nokia 3585I	July 2003	LG 3200	November 2004
Motorola V60x	September 2003	Motorola V262	December 2004
LG 5450	December 2003	Motorola V265	March 2005
Kyocera 3250	January 2004	LG 4750	March 2005
Audiovox 8410	January 2004	Kyocera KX440	March 2005
		Kyocera KX1	April 2005
		Blackberry 7250	April 2005
		Nokia 6255I	June 2005
		Kyocera Blade	June 2005

² An ALLTEL internal review has revealed isolated activations of some customer-owned and other non-ALI-capable handsets, contrary to established ALLTEL policy governing the activation of such handsets. Corrective action has been undertaken to ensure that this policy is adhered to in the future.

III. Accuracy Requirements and Methodology

Alltel's extensive testing and evaluation processes were reported and detailed in its earlier Quarterly Reports. Alltel has transitioned from testing and evaluating its AGPS solution, which Alltel believes is compliant with the Commission's rules and consistent with OET Bulletin 71, to real-world deployment of its technology in response to valid PSAP requests. Alltel has contracted with TechnoCom to develop procedures and provide assistance to establish proper techniques to configure each cell site and sector as well as to ensure accurate delivery of Phase II location information to capable PSAPs. Alltel and TechnoCom are working closely with individual capable PSAPs to further test and refine the accuracy and reliability of its solution, taking into account the particulars of each individual PSAP's network and capabilities. In all markets in which PSAPs have requested service, Alltel is capable of transmitting Phase II-compliant ALI to the PSAP for all of its MSC vendors – Lucent, Nortel and Motorola. As discussed below, additional testing is required as individual PSAPs complete their own upgrades and deployment proceeds on a PSAP by PSAP basis. Finally, Alltel continues to test new ALI-capable handsets prior to their acceptance into its product line to establish benchmarks for Phase II location accuracy.

IV Deployment Issues

As previously reported, Alltel has encountered the same PSAP, vendor and LEC issues as well as the technology hurdles normally experienced with the initial deployment of a maturing technology. These issues have arisen in both the Phase I and Phase II contexts. Alltel's experience indicates that, in most markets, problems are resolved in a timely manner and subject to mutually agreed upon deployment schedules for Phase II so that service to the PSAPs is not adversely affected.

Regarding those networks Alltel has acquired through acquisition, Alltel has converted, or will convert, these GSM/TDMA networks to CDMA and, consequently, Alltel's handset-based E-911 Phase II solution, to provide Phase II service in response to valid PSAP requests. Where PSAPs in these markets are currently providing Phase II service, Alltel has made arrangements to continue the existing network-based solution to provide continuous E-911, Phase II services until the CDMA conversion is complete, and the GSM/TDMA platforms are discontinued. Alltel continues to work hand-in-hand with the PSAPs in these markets to ensure timely deployment according to the negotiated dates.

V. Status of Phase I and Phase II Deployment Efforts.

Alltel continues to strive for early E-911 deployment. Additional markets are moving rapidly toward live Phase II deployment. Detailed spreadsheets on both Phase I and Phase II deployment schedules are attached to this filing. Alltel would be pleased to provide the Commission with such additional information as it may require.

A. Phase I

Alltel has received 983 Phase I PSAP requests as of August 1, 2005. Alltel has approximately 39 PSAP requests for Phase I in progress with implementation scheduled for the agreed upon deployment date listed in the attached spreadsheets. Alltel has received 78 requests for Phase I service which have been determined to be non-bona fide requests, and Alltel continues to work with these PSAPs' in order to schedule activation in accordance with the prospective time frame for the PSAPs readiness.

B. Phase II

To date Alltel has received a total of 593 Phase II requests. Of this number, more than 493 requests have been met and service has been cut-live, while approximately 86 requests are in progress with deployment scheduled for the agreed upon dates listed on the attached spreadsheets. Alltel has received 54 non-bona fide requests, and Alltel continues to work with these PSAPs in order to schedule activation in accordance with the prospective time frame for the PSAPs' readiness.

C. General Condition

As previously reported, technology issues for Alltel's multi-vendor network have largely been resolved and Alltel continues to work aggressively to resolve open issues on a PSAP-by-PSAP basis. Although some minor delays in Phase II service have occurred, Alltel has taken all the steps for deployment that are not dependent on PSAP readiness. Alltel has completed all hardware and software upgrades necessary in its own network and completed testing; accounted for all trunking between its system to the selective router and the ALI database; and established and maintained contact with the PSAPs to obtain any necessary information. Order on Reconsideration, FCC 02-318, ¶ 21 (rel. Nov. 26, 2002), codified at 47 C.F.R. § 20.18(j)(4)(vi). As discussed above, however, full end-to-end testing requires PSAP participation. Also, as discussed in previous reports (incorporated herein by reference) further refinements are necessary during the final deployment stages, as each PSAP's network and equipment is different. Alltel continues to arrive at mutually agreed upon launch dates with its PSAPs. *See* 47 C.F.R. § 20.18(j)(5). Nevertheless, in some markets there is a chance that Alltel will encounter unforeseen delays in implementation and, consequently, may need to seek specific and limited relief from deployment deadlines. Alltel's good faith efforts warrant Commission flexibility as Alltel works through the PSAP-specific issues that will arise during final end-to-end testing with PSAPs.³

Alltel would be pleased to provide the Commission with such additional information as the Commission may require.

³ As the Commission has acknowledged, an additional period of time is required between the time the PSAP becomes E-911 capable and the date of service launch. *See* 47 C.F.R. § 20.18(j)(4)(x) (affording certifying carriers 90 days to provide E911 service after the PSAP becomes capable).

Declaration

I have read the foregoing E-911 Twelfth Quarterly Report of Alltel Communications, Inc. and declare under penalty of perjury that it is true and correct to the best of my information and belief. Executed August 1, 2005.

/s/

Glenn S. Rabin
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CERTIFICATE OF SERVICE

I, Glenn S. Rabin, hereby certify that on the 1st day of August, 2005, I caused copies of the foregoing "Twelfth Quarterly Report" to be sent to the following by first class mail, postage pre-paid, to the following:

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/s/ _____

Glenn S. Rabin

* Robert Gurss has been removed from the service list per the request of his letter notification dated May, 2005. Service to APCO has been effected to the Dayton Beach office.

